

20cr223 MWL/LIB

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

v.

(1) KYLE DALE CLARK,  
(2) JOSE ARCEGA-VEJAR,  
    a/k/a "Jos Ar,"  
    a/k/a "Jose Robles,"  
(3) VALERIE ANN CLARK,  
(4) VANESSA LOUISE COBENAIS,  
(5) KATHI LYN DUDLEY,  
(6) COREY LEE DONNELL,  
(7) DREW WILLIAM GRAVES, and  
(8) KALYSSA KAILANI DEANAH WHITE,

18 U.S.C. § 922(d)(1)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(a)(2)  
18 U.S.C. § 924(d)(1)  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(A)  
21 U.S.C. § 846  
21 U.S.C. § 853  
28 U.S.C. § 2461(c)

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

(Conspiracy To Distribute Methamphetamine)

Beginning in or about approximately August 2019, and continuing through in or about December 2019, the exact dates being unknown to the grand jury, in the State and District of Minnesota, the defendants,

**KYLE DALE CLARK,  
JOSE ARCEGA-VEJAR,  
    a/k/a "Jos Ar,"  
    a/k/a "Jose Robles,"  
VALERIE ANN CLARK,  
VANESSA LOUISE COBENAIS,  
KATHI LYN DUDLEY,  
DREW WILLIAM GRAVES, and  
KALYSSA KAILANI DEANAH WHITE,**

**SCANNED**

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did unlawfully, knowingly, and intentionally conspire with each other and others known and unknown to the grand jury, to possess with intent to distribute, and to distribute 50 grams or more of methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

**COUNT 2**

(Felon in Possession of a Firearm)

On or about November 2, 2019, in the State and District of Minnesota, the defendant,

**KYLE DALE CLARK,**

having previously been convicted of the following crime, which is punishable by imprisonment for a term exceeding one year:

<b>Offense</b>	<b>Place of Conviction</b>	<b>Date of Conviction (On or About)</b>
Assault Resulting in Serious Bodily Injury	U.S. District Court, District of Minnesota	12/9/2015

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, to wit: a Glock model 26gen5, 9mm pistol, serial number ADLP 470, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT 3**

(Sale or Transfer of a Firearm to a Prohibited Person)

On or about October 19, 2019, in the State and District of Minnesota, the defendant,

**COREY LEE DONNELL,**

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knowingly sold and otherwise disposed of a firearm, to wit: a Glock model 26gen5, 9mm pistol, serial number ADLP 470, to Kyle Dale Clark, knowing and having reasonable cause to believe that Kyle Dale Clark had been convicted of a crime of punishable by imprisonment for a term exceeding one year, all in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

### **FORFEITURE ALLEGATIONS**

Count 1 of this Indictment is incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

If convicted of Count 1 in this Indictment, the defendants,

**KYLE DALE CLARK,  
JOSE ARCEGA-VEJAR,  
a/k/a "Jos Ar,"  
a/k/a "Jose Robles,"  
VALERIE ANN CLARK,  
VANESSA LOUISE COBENAIS,  
KATHI LYN DUDLEY,  
DREW WILLIAM GRAVES, and  
KALYSSA KAILANI DEANAH WHITE,**

shall forfeit to the United States pursuant to Title 21, United States Code, Sections 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations, including, but not limited to \$5,636 in U.S. Currency from Kyle Dale Clark during his November 2, 2019 arrest. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p).

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Counts 2 and 3 of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

If **KYLE DALE CLARK** or **COREY LEE DONNELL** are convicted of any of Counts 1-3 in this Indictment, defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c), any firearms, accessories or ammunition involved in or used in knowing violation of these Counts, including, but not limited to, a Glock model 26gen5, 9mm pistol, serial number ADLP 470, and any ammunition and accessories seized therewith.

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON